

08/07/97 THU 07:14 FAX



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 600
DENVER, COLORADO 80202-2468

Mr. Steve Slaten, RFCA Project Coordinator
Department of Energy - Rocky Flats
P.O. Box 928
Golden, Colorado 80402-0928

SUBJECT: July 17, 1997 Source Evaluation Plan

Dear Mr. Slaten:

EPA believes that the Plutonium concentration of 0.86 picocuries/liter (pCi/l) measured in Walnut Creek in April of 1997 represents an exceedance of the standard at a RFCA point of compliance. We understand that DOE does not agree. Given that the standard agreed to by the Water Quality Control Commission will be effective January 1, 1998, we prefer not to debate the issue, and instead have all parties focus attention on determining the cause of the elevated measurements and taking appropriate actions to address the problem.

With that in mind, we have reviewed the "Plan for Source Evaluation and Preliminary Proposed Mitigating Actions" which you submitted on July 17, 1997 (97-DOE-05335). The general approach you have set up for responding to the observed exceedance of Plutonium standards appears sound, but the plan lacks specific criteria for deciding when an exceedance will be considered "significant" enough to warrant action and for determining what mitigating action(s) should be taken. We think the plan requires considerable strengthening in these areas.

Section 2 of the plan (page 5) indicates that the "unusual" plutonium values observed at GS03 on April 13, 1997 were not reflected in the A-4 discharge that was then being completed, based on composite samples from GS11. This raises an obvious question. If the plutonium didn't come out of pond A-4, then where did it come from? The sediments of lower Walnut Creek and the drainage basin of No Name Gulch would make good suspects. Neither of these areas has been examined in detail as a possible source of plutonium loading to downstream segments. The data you present suggests that such an examination is needed but your source evaluation plan (page 8) says only that significant sources of sediment "could" be sampled. We are aware of your ability to take samples. What we would like to see in this plan is a commitment to do so when warranted, and a specific statement of the decision criteria for when and where sampling will be done.

Your source evaluation proposal for GS10 presented in Section 3.1 (page 6) is largely a reiteration of efforts which are either ongoing or already completed. The plan indicates that existing and future data will be evaluated to determine "the significance of the current 30-day moving average values at GS10." We think the observed values are clearly "significant." The fact that future observations may show that such values are likely to reoccur under similar antecedent conditions will only reinforce this conclusion. An explanation of what sort of future data might render the current findings "insignificant" in your judgement might help us understand your logic. In our estimation the data you have already presented justify the efforts to better identify mass



Printed on Recycled Paper

ADMIN RECORD

BZ-A-000998

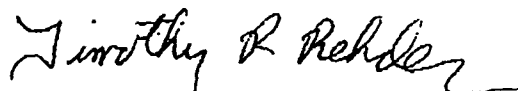
1/2

transport patterns in the sub-drainages which you describe in section 3.1.3. We believe they should be pursued now.

The mitigating actions you describe in section 4 (page 9) all seem reasonable, but again they often say what "could" be done. Watershed improvements may in fact be the most appropriate response to the observed movement of plutonium in the drainages. What this plan needs to present is a definitive statement of how source evaluation results will identify the target areas for such actions, what results will be considered indicative of the need for action, and when and how such actions *will* be completed.

We look forward to seeing a revised plan that will contain more detail on both actions to be taken in the evaluation and the mitigation of elevated Plutonium in Walnut Creek. Please contact me if you have questions about EPA's position on this matter.

Sincerely,



Timothy R. Rehder
Rocky Flats Project Manager

cc: Steve Tarlton (CDPHE)
Dave Shelton (KH)



Printed on Recycled Paper

2/r